

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

YOLANY PADILLA.; IBIS GUZMAN.; BLANCA ORANTES; BALTAZAR VASQUEZ;

Plaintiffs-Petitioners,

V.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (“ICE”); U.S. DEPARTMENT OF HOMELAND SECURITY (“DHS”); U.S. CUSTOMS AND BORDER PROTECTION (“CBP”); U.S. CITIZENSHIP AND IMMIGRATION SERVICES (“USCIS”); EXECUTIVE OFFICE FOR IMMIGRATION REVIEW (“EOIR”); MATTHEW ALBENCE, Acting Director of ICE; KEVIN K. MCALLENAN, Acting Secretary of DHS; JOHN P. SANDERS, Acting Commissioner of CBP; L. FRANCIS CISSNA, Director of USCIS; ELIZABETH GODFREY, Seattle Field Office Acting Director, ICE, WILLIAM BARR, United States Attorney General; LOWELL CLARK, warden of the Northwest Detention Center in Tacoma, Washington; CHARLES INGRAM, warden of the Federal Detention Center in SeaTac, Washington; DAVID SHINN, warden of the Federal Correctional Institute in Victorville, California; JAMES JANECKA, warden of the Adelanto Detention Facility;

No. 2:18-cv-928 MJP

**JOINT STIPULATION
AND [PROPOSED]
ORDER REGARDING
PRELIMINARY
INJUNCTION
IMPLEMENTATION**

NOTE ON MOTION
CALENDAR: JUNE 25, 2019.

Defendants-Respondents.

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs and Defendants hereby stipulate and jointly move the Court for an Order staying implementation of the preliminary injunction, entered by this Court on April 5, 2019, by an additional week, until July 8, 2019.¹

Currently, the hearing on the motions is set for Friday, June 28, 2019, and the injunction implementation date is Monday, July 1, 2019 (the next business day). The parties respectfully

¹ By rule, the parties cannot further extend the deadline for filing an appeal, and the operative deadline to appeal the injunction is July 5, 2019. See ECF 129.

1 move for this stay in light of the upcoming hearing on Defendants' motion to vacate the injunction
2 and Plaintiffs' motion to modify the injunction, in order to provide certainty as to the
3 implementation date and avoid unnecessary confusion that would result from implementing an
4 injunction that would soon be vacated or modified. Should this Court rule on the motion to vacate
5 and motion to modify prior to July 8, the parties would be bound by that order and any vacatur or
6 timeline for implementing a modified injunction, and not this stipulation.
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JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING PRELIMINARY
INJUNCTION IMPLEMENTATION - 2
CASE NO. 2:18-cv-928 MJP

U.S. Department of Justice, Civil Division
Office of Immigration Litigation, District Court Section
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Telephone (202) 616-4458

1 RESPECTFULLY SUBMITTED this 25th day of June, 2019.
2

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31 JOINT STIPULATION AND [PROPOSED]
32 ORDER REGARDING PRELIMINARY
33 INJUNCTION IMPLEMENTATION - 3

34 CASE No. 2:18-cv-928 MJP

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[PROPOSED] ORDER

Based on the foregoing stipulation of the parties, IT IS SO ORDERED. Compliance with the preliminary injunction is STAYED until July 8, 2019.

DATED this ____ day of _____, 2019.

THE HONORABLE MARSHA J. PECHMAN
UNITED STATES DISTRICT JUDGE

JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING PRELIMINARY
INJUNCTION IMPLEMENTATION - 4
CASE No. 2:18-cv-928 MJP

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2019, I had the foregoing electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

/s/ Lauren C. Bingham
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JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING PRELIMINARY
INJUNCTION IMPLEMENTATION - 5
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